

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

NICOLE WOOTEN,

Plaintiff,

v.

LIMETREE BAY TERMINALS d/b/a  
OCEAN POINT TERMINALS, PORT  
HAMILTON REFINING AND  
TRANSPORTATION, and WEST  
INDIES PETROLEUM, LTD.,

Defendants.

Case No. 1:23-CV-00012

**ACTION FOR DAMAGES**

**JURY TRIAL DEMANDED**

**NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM**

**COME NOW** Plaintiff, by and through the undersigned counsel, and hereby file her Notice of Intent to Serve a Subpoena Duces Tecum and Notice of Subpoena Duces Tecum upon Total Safety Virgin Islands LLC, at Dudley Newman Feuerzeig LLP, 1131 King Street, Suite 204, Christiansted VI 00820.

RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiff

DATED: June 30, 2025

BY: /s/ Lee J. Rohn

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Wooten, Nicole v. Limetree Bay Terminals, et. al., Case No. 1:23-CV-00012  
**Notice of Intent to Serve Subpoena Duces Tecum**  
Page 2

**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on June 30, 2025, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

All counsel of record.

BY: /s/ Lee J. Rohm (al)